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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

J.B. HUGHES AND ASSOCIATES, Plaintiff, vs. GIUNIO SANTI ENGINEERING and GENERAL DYNAMICS ELECTRIC BOAT, Defendants.	Case No. 16-cv-0114-DMS-JMA **STIPULATION TO DISMISS ELECTRIC BOAT CORPORATION WITH PREJUDICE** Hon. Dana M. Sabraw

Pursuant to Federal Rule of Civil Procedure 41, Plaintiff J.B. Hughes and Associates ("JBHA") and Defendant Electric Boat Corporation ("EBC") (identified in this action as "General Dynamics Electric Boat"), by and through their undersigned counsel and subject to approval of the Court, hereby stipulate to the dismissal of this action against EBC with prejudice.

Whereas, on November 18, 2016, the Court granted EBC's motion to dismiss JBHA's First Amended Complaint ("FAC") (Dkt. 22), dismissed JBHA's claim for unjust enrichment with prejudice (count IV), and granted leave to file a Second Amended Complaint that cures the pleading deficiencies identified in the Court's order by December 16, 2016 (Dkt. No. 36);

Whereas, the parties agree that JBHA will not file any amended complaint against EBC in connection with this action, including any Second Amended Complaint;

Whereas, the parties now agree that the Court's dismissal of JBHA's FAC as to EBC shall be with prejudice;

Whereas, the parties agree that EBC will not take any further action against JBHA, or seek attorneys' fees or costs from JBHA, in connection with this action;

Therefore, the parties stipulate to dismissal of this action and that any and all claims for relief against EBC in connection with this action are dismissed with prejudice, with each party to bear its own costs, expenses, and attorneys' fees, and waiving all rights of appeal.

Dated: December 16, 2016

Respectfully submitted,

/s/ *Timothy Perry*
Timothy Perry (SBN 248543)
Elaine Zhong (SBN 286394)
WILMER CUTLER PICKERING
HALE AND DORR LLP

Attorneys for Defendant Electric Boat Corporation

/s/ *Michael C. Keeling*
Michael C. Keeling

Attorney for Plaintiff J.B. Hughes and Associates

CERTIFICATE OF SERVICE

I hereby certify that I am an attorney at Wilmer Cutler Pickering Hale and Dorr LLP. My business address is 350 S. Grand Ave., Suite 2100, Los Angeles, CA, and I am over the age of eighteen years and not a party to the above-titled action.

I certify that on December 16, 2016, I served the following document:

STIPULATION TO DISMISS ELECTRIC BOAT CORPORATION WITH PREJUDICE

The document was served by electronic means via the Court's CM/ECF system to those on the Court's Electronic Mail Notice List who are currently signed up to receive e-mail notices for this case:

- Michael Chancey Keeling
  mike@keelinglaw.org

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 16, 2016

/s/ *Timothy Perry*
Timothy Perry